

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

**BEAUFORT DIVISION**

RICHARD ALEXANDER  
MURDAUGH, JR.,

Plaintiff,

vs.

BLACKFIN, INC., WARNER BROS.  
DISCOVERY, INC., WARNER  
MEDIA ENTERTAINMENT PAGES,  
INC., CAMPFIRE STUDIOS INC.,  
THE CINEMART LLC, NETFLIX,  
INC., GANNETT CO., INC. AND  
MICHAEL M. DEWITT, JR.,

Defendants.

Case No. 9:24-cv-04914-RMG

**DECLARATION OF MERYL C. GOVERNSKI IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

I, Meryl C. Governski, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am admitted to practice law before the courts of the District of Columbia and have been admitted to this court *pro hac vice*. I am a partner at Willkie Farr & Gallagher LLP, who, along with Nelson Mullins Riley & Scarborough, LLP, are attorneys for Defendants Blackfin, Inc. ("Blackfin"), Warner Bros. Discovery, Inc. ("WBD") and Warner Media Entertainment Pages, Inc. ("Warner Media Entertainment") (collectively, with the corporate entities disclosed in the Amended Answer to Local Rule 26.01 Interrogatories, "Warner Entities") (Blackfin, with Warner Entities, "Moving Defendants").<sup>1</sup>

2. I submit this Declaration in support of the Moving Defendants' Memorandum of Law in support of their Motion to Dismiss Plaintiff's Complaint.

3. Exhibits A-C are true and correct copies of the documentary, "Murdaugh Murders: Deadly Dynasty," which the Complaint alleges was produced by Blackfin and aired on discovery+ and the Investigation Discovery television channel ("Blackfin Documentary"). We intend to lodge Exhibits A-C with the Court and to provide copies of the same to opposing counsel shortly after filing the motion.

4. Attached as Exhibits D-F are true and correct copies of transcripts of the Blackfin Documentary.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 16, 2024  
Washington, D.C.

/s/ Meryl C. Governski  
Meryl C. Governski

---

<sup>1</sup> For the reasons explained in the Amended Answer to Local Rule 26.01 Interrogatories (Dkt. 44), WBD and Warner Media Entertainment are not the proper parties.